



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

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JUL 23 1987

Timothy Rogers, Esq.
Assistant General Counsel
American Can Packaging Co.
American Lane
P.O. Box 2600
Greenwich, Connecticut 06836-2600

Re: Taylor Borough Site; U.S. v. Serafini et al.

Dear Tim:

I am transmitting, by means of this letter, comments prepared by EPA's contractor on the Settlers' Health and Safety Plan. Patricia Tan, EPA's Remedial Project Manager, has already transmitted a copy to her various contacts at RCA and Hart. However, and as requested in my July 17th, 1987 letter to Marc Gold, it would help if you would provide us with the name of your Project Manager, so that Ms. Tan would know who her primary contact is supposed to be.

Sincerely yours,

Lydia Isales
Lydia Isales
Assistant Regional Counsel

Enclosure

cc: Steve Baer, Esq.
Jim Dougherty, Esq.
Patricia Tan (w/out enclosure)
Marc Gold, Esq.
Michael Dolan, Esq.
Theodore Craver, Esq.
Jim Murray, Esq.
Thomas Styczen, Esq.
Noel Bartsch
Bruce Brandier, Esq.

AR301255



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July 21, 1987

Ms. Patricia Tan
SARA Special Sites Section (3HW-17)
U.S. EPA Region 3
841 Chestnut Street, 6th Floor
Philadelphia, PA 19107

Subject: Review of Health and Safety Plan, Taylor Borough Site, submitted by Hart Engineers, Inc., July 15, 1987 (TES 3 Work Assignment No. 373)

Dear Ms. Tan:

PRC Environmental Management, Inc. received a copy of the "Health and Safety Plan, Taylor Borough Site, Remediation Activities, Lackawanna County, Pennsylvania" on July 16. This plan was prepared by B.E.S. Environmental Specialists, Inc. and was submitted by Hart Engineers, Inc., the potentially responsible party (PRP) contractors. The plan covers (1) health and safety requirements for PRP contractors during remedial action; (2) air monitoring to be conducted by PRP contractors; and (3) emergency notification and evacuation procedures. Under TES 3 Work Assignment No. 373, PRC is overseeing part of the remedial action at Taylor Borough Landfill; a review of the PRP health and safety plan was included in our scope of work for this assignment. This letter constitutes PRC's review of the PRP health and safety plan. Our comments have not yet been reviewed by CDM FPC, the TES 3 prime contractor. As a result, they should be considered preliminary and are subject to change as a result of CDM's QA/QC and technical reviews.

The remainder of this letter includes a brief summary of plan contents. This is followed by PRC's comments on each of the three sections of the PRP health and safety plan. Our review indicates that the plan is deficient in several areas. Finally, PRC presents recommendations on how these deficiencies should be corrected before starting remedial action.

The PRP health and safety plan is organized into three sections. Section 1.0 (Introduction) contains a brief description of on-site air monitoring activities to be conducted by Hart. This section also presents action levels -- air monitoring results that will be used to determine personnel protection measures and the need for emergency procedures. Section 1.0 appears to be the only part of the PRP health and safety plan that was written recently (within the last four years). Section 2.0 contains specific site safety protocols to be followed by PRP contractor personnel. This section also contains a more detailed description of personnel monitoring activities. Section 2.0 is dated "9/22/83" and appears to have been written for previous site work conducted by B.E.S. There is no indication that the information in this section has been updated or revised to reflect current site conditions. Section 3.0 contains emergency response information. It includes a

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detailed set of procedures to be followed in the event of an emergency during remedial action. This section also appears to have been developed for previous site work, and there is no evidence that the material has been updated recently.

Section 1.0

PRC has two major comments concerning this section of the PRP health and safety plan. Both comments pertain to action levels proposed by Hart.

- o Hart proposes to use an organic vapor analyzer (OVA) to monitor air contaminant concentrations during remedial action. Hart will use concentrations of 10 ppm and 25 ppm as action levels for upgrading personnel protection to levels C and B, respectively. It is PRC's opinion that these levels are too high.

PRC previously identified volatile organic compounds (VOC) that were likely to be emitted during remedial action (see PRC's Preliminary Air Sampling and Monitoring Plan dated June 8, 1987). PRC also reviewed occupational exposure standards for these VOCs; the lowest standard identified was 10 ppm. Based on this information, an action level of 10 ppm for upgrading respiratory protection to level C appears to be reasonable. However, a 10 ppm action level does not consider the possibility that other more toxic (but as yet unidentified) VOCs could be emitted during remedial action.

PRC's health and safety plan will recommend lower action levels for oversight personnel. The practical implications of lower action levels for oversight personnel are as follows. We assume that U.S. EPA will allow on-site work to continue only when oversight personnel are present. Thus, if oversight personnel must leave the work area to upgrade protective equipment (for example, to change from level C to level B), work must stop. PRC does not intend to delay work unnecessarily, but feels that the work schedule is secondary to the protection of oversight personnel.

- o Hart recommends an action level of 25 ppm for emergency notification. This level is to be measured 500 feet from the excavation or at the property line, whichever is greater. This level is inappropriate and will not sufficiently protect the public. The nearest residence is about 400 feet from the excavation area, well within Hart's 500-foot limit. U.S. EPA's Environmental Response Team recommends emergency notification when concentrations in residential areas reach 1 to 2 ppm.

Hart describes all of the above action levels as "OVA readings of organic hydrocarbons." This description requires further explanation because (1) the OVA is sensitive to methane and (2) some methane is likely to be present in the air because Taylor Borough Landfill was used for municipal waste disposal. Specifically,

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Hart should indicate how they will determine which part of the OVA reading is due to methane and which part is due to non-methane hydrocarbons.

Section 2.0

This section of the plan contains a specific site safety protocol for PRP personnel. As noted earlier, this section was apparently prepared by B.E.S. for previous work at Taylor Borough Landfill and is dated 9/22/83. As a result, several items in the protocol are irrelevant to the remedial action work that is to begin in July 1987. For example, the support area described on page 3 (and shown on the map on the second page following page 6) is located near the residences, south of the remedial action area. However, it is PRC's understanding that the support area is to be located near Snake Road, at the northernmost point of the landfill. Because some parts of the protocol are not relevant to current work, we cannot clearly determine which parts of the protocol will be followed during remedial action. Additional specific comments on Section 2.0 are as follows.

- o The levels of personnel protection on page 4 do not agree with the levels described in Section 1.0. This page states that all excavation and soil removal operations will be performed by personnel wearing level B protection; there is no reference to action levels. Since the majority of the work will consist of excavation and soil removal, level B protection may be worn at nearly all times. Two other possibilities exist. First, the requirements on page 4 may apply only to B.E.S. personnel while the requirements in Section 1.0 apply only to Hart personnel. Second, personnel protection requirements on page 4 may have been applicable to 1983 site work, but were not updated for current work.
- o The decontamination protocol on page 5 is not adequate. It states only that personnel and equipment leaving the site will be thoroughly decontaminated; no specific methods or procedures are given. This is of concern to PRC for two reasons. First, the number of trucks entering and leaving the site will be large -- at least 200, assuming Hart's excavation volume of 3,000 yd³ and a truck capacity of 15 yd³. The health and safety plan should provide some assurance that these trucks (as well as other equipment leaving the site) are free of contamination. Second, under arrangements made through U.S. EPA, oversight personnel will use PRP decontamination facilities and procedures. In the absence of any specific information, PRC cannot determine if these facilities and procedures are adequate.
- o Page 5 describes an air monitoring protocol that is considerably more detailed than the OVA measurements described in Section 1.0. The procedure in Section 2.0 includes portable sampling pumps with sampling tubes, on-site analysis of results by gas chromatography, and possibly laboratory analysis of sampling tubes. It is not clear to PRC whether the PRPs will implement these activities or whether this procedure is applied to previous 1983 site work only.

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If Hart or B.E.S. plan to carry out the air monitoring activities described on page 5, additional details on the number and location of samples should be provided. Sampling times should also be increased. The times in the plan range from 5 to 50 minutes. Air samples collected over these short periods may detect peak contaminant concentrations, but will not provide much information about the overall amount of contamination leaving the remedial action area.

PRC also notes that the On-Site Air Monitoring section starts with the phrase "Since Level C protection appears to be applicable. . ." This statement is contrary to the personnel protection requirements described on page 4.

- o Page 6 lists several persons and organizations that should be contacted in the event of an on-site emergency. This list should be prioritized so that on-site personnel have some idea of who to contact first. Also, telephone numbers for all contacts should be verified; these numbers may have changed since this part of the plan was originally prepared in 1983. For example, the telephone number for the U.S. EPA contact is incorrect.
- o The unnumbered page following page 6 describes routes from the site to hospitals. These routes should be updated. Personnel will leave the site via Snake Road, not from Prince Street as this page indicates.

Section 3.0

This section of the health and safety plan contains notification and evacuation procedures to be followed in the event of an emergency at Taylor Borough Landfill. (See PRC's comments on Section 1.0 concerning the 25 ppm action level that Hart plans to use to define an emergency.) As was Section 2.0, this section appears to have been written for 1983 work conducted by B.E.S. PRC has several general comments concerning Section 3.0.

First, the material presented in this section is poorly organized. The section begins with an emergency plan containing Sections I through VI, followed by Appendices 1 through 6. This is followed by a supplement to the emergency plan; two maps; Appendices 6 through 8; two untitled pages of text; four additional maps; a 1983 letter to the Pennsylvania Emergency Management Agency; two pages of phone numbers; a page titled "Taylor Nursing Home;" and an evacuation plan for the Riverside School District. The health and safety plan did not include a table of contents, and PRC cannot determine the relevance or importance of much of this information.

Second, since the material in Section 3.0 was probably written in 1983, it must be updated. Telephone numbers of key contacts in this section should be verified. Key contacts should also be verified. For example, Section VI.A. PRC's comments and Appendix 5 lists "Alert Area" contact persons for the neighborhoods surrounding Taylor Borough Landfill. It is unlikely that this list is current. The same comment

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applies to the list of non-ambulatory residents in Appendix 3. In addition, Section 3.0 delegates much of the post-notification responsibilities to Taylor Borough and other government officials. While these arrangements may have been worked out for previous site activities in 1983, it is unclear to PRC whether these arrangements are still in place. For example, Section VI.C.1 indicates that evacuation determinations will be made by the Pennsylvania Department of Environmental Resources (PADER). PRC was not aware that PADER had this large a role in the upcoming remedial action activities.

Third, all of the emergency response information in Section 3.0 describes what will happen off-site. The plan should also discuss on-site emergency response. Specifically, the health and safety plan should describe measures that on-site personnel will take to reduce air emissions in the event of a significant release. If the release cannot be stopped, the plan should describe how personnel will evacuate the site. If this information is contained in other site plans, the health and safety plan should refer to these other plans.

Recommendations

The health and safety plan prepared by B.E.S. Environmental Specialists, Inc. and submitted by Hart Engineers, Inc. is deficient in several respects. PRC recommends that these deficiencies be corrected as summarized below.

- o The plan should include a table of contents, particularly for Section 3.0. This document is intended to serve as a quick reference that on-site personnel can use in the event of an emergency. However, the document is poorly organized, and without a table of contents, valuable response time could be lost while searching through the health and safety plan for the appropriate information.
- o Personnel protection requirements for PRP personnel must be clarified, since the plan currently presents contradictory information.
- o Air concentration action levels for determining levels of protection may be different for PRP and oversight personnel. Hart should be made aware of this difference and how it might affect scheduled excavation activities.
- o Hart's air concentration action level for beginning emergency notification procedures (25 ppm) is an order of magnitude higher than the level recommended by U.S. EPA's Environmental Response Team and is too high to ensure adequate protection for off-site populations. The action level should be lowered to a level agreed upon by Hart and U.S. EPA before excavation is allowed to proceed.
- o Hart should clearly state which activities within Section 2.0 apply to the remedial action that will begin in July 1987. An area of particular concern to PRC is the air monitoring activities described on page 5.

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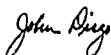
- o Hart should describe specific decontamination procedures that will be used for equipment and personnel leaving the site.
- o Information presented in Sections 2.0 and 3.0 of the plan should be verified, since it is probably not current. In particular, names of contacts and contact telephone numbers should be checked.
- o Hart should provide U.S. EPA with assurances that the emergency response arrangements in Section 3.0 are currently in effect and that Hart has cleared these arrangements with all applicable officials and agencies.
- o Hart should describe on-site emergency response measures, including procedures for reducing air emissions and evacuating the site.

PRC recommends that at a minimum, U.S. EPA and Hart verbally resolve each of the above points. Hart should provide written confirmation of this resolution. Given the short period between the submittal of the health and safety plan (July 16) and the start of field work (July 27), this may be all that is possible; that is, it may not be possible for Hart to submit a revised (and current) version of the health and safety plan.

PRC further recommends that the start of field work be delayed if a satisfactory resolution to these issues cannot be reached. In our opinion, the safety of off-site populations and on-site personnel should take precedence over scheduling considerations. This safety can be assured only if realistic action levels are developed, clear personnel protection requirements are established, and up-to-date emergency response procedures are in place. All of this must occur before site activities begin.

If you have any questions regarding PRC's comments, please contact me at (312) 938-1999.

Sincerely,
PRC ENVIRONMENTAL MANAGEMENT, INC.



John Dirgo
Environmental Scientist

cc: Harry Butler, CDM FPC (3 copies)
Mark diFelicianantonio, CDM FPC Region 3
Daniel Chow, PRC

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